

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
ELAINE IOANNOU,

Plaintiff,

Docket No.:
1:11-cv-02264-DLI-RML

-against-

JP MORGAN CHASE BANK C/O
CT CORPORATION SYSTEM,
FIRM CONNECTIONS, LLC (DBA)
IVY BOUND TEST PREP

NOTICE OF MOTION

Defendants.
-----X

MOTION BY: Defendant, JPMorgan Chase Bank, N.A. ("Chase") s/h/a JP Morgan Chase Bank c/o CT Corporation System, by its attorneys, Stagg, Terenzi, Confusione & Wabnik, LLP

SUPPORTING PAPERS: The Memorandum of Law in Support of Chase's Motion to Dismiss, the Affirmation of Haley E. Olam, affirmed on May 18, 2011, all exhibits annexed thereto; and all prior pleadings and proceedings heretofore had herein.

**RETURN DATE, TIME
AND PLACE:**

At the United States District Court, Eastern District of New York, at the Courthouse thereof, located at 225 Cadman Plaza East, Brooklyn, New York 11201, on the 8th day of June, 2011, at 9:30 o'clock in the forenoon of that day, or as soon thereafter as counsel may be heard.

RELIEF SOUGHT: An Order: (1) dismissing plaintiff's complaint against Chase with prejudice pursuant to Rule 12(b) of the Federal Rules of Civil Procedure; (2) awarding Chase its fees and costs in connection with this motion; and (3) granting Chase such other and further relief as the Court deems just and proper.

ANSWERING PAPERS: Pursuant to Eastern District Civil Rule 6.1(b), answering papers, if any, are required to be served upon the undersigned within fourteen (14) days after service of the moving papers and any reply papers shall be served within seven (7) days after service of the answering papers.

Dated: Garden City, New York
May 18, 2011

Yours, etc.,

**STAGG, TERENZI, CONFUSIONE
& WABNIK, LLP**

By: s/ Haley E. Olam

Haley E. Olam

Attorney for Defendant

JPMorgan Chase Bank, N.A.

Office & P.O. Address:

401 Franklin Avenue, Suite 300

Garden City, New York 11530

(516) 812-4500

(516) 812-4600 Fax

TO: Niranjan G. Sagapuram, Esq.
Law Offices of Jimmy C. Solomos
Attorneys for Plaintiff
Office & P.O. Address:
33-08 Broadway
Astoria, New York 11106
(718) 278-5900

Daniele D. De Voe, Esq.
Weinstein, Kaplan & Cohen, P.C.
Attorneys for Defendant
Firm Connections LLC (DBA)
Ivy Bound Test Prep
Office & P.O. Address:
1325 Franklin Avenue
Suite 210
Garden City, New York 11530
(516) 877-2525